

**REMARKS**

Claims 1-17 are pending in the application, and were rejected as follows:

<b>Claims / Section</b>	<b>35 U.S.C. Sec.</b>	<b>References / Notes</b>
7, 15	§112, First Paragraph	<ul style="list-style-type: none"> <li>• Enablement of "inversely related" language</li> </ul>
1-17	§102(e) Anticipation	<ul style="list-style-type: none"> <li>• Pirolli et al. (U.S. Patent No. 5,895,470).</li> </ul>

- 5 Applicant responds by amending claims 1 and 10, adding claims 18 and 19, and by the following discussion addressing the previous rejections.

**35 U.S.C. §112, First Paragraph, Claims 7, 15**

1. *Applicant maintains the argument that the written description enables claim language relating to the distance measure being inversely related to the*
- 10 *measure of similarity because it teaches that a choice of functions may be used for this distance determination, and an inverse function ( $1/x$ ) is a function well known in the art.*

- According to the Specification at p. 5, last carryover paragraph, the distance between two documents may be determined by multiplying two column vectors and
- 15 taking the sum of the products, where a greater distance between the two documents reflects a greater degree of similarity. The specification goes on to say (p. 6, first carryover paragraph) that, "the choice of functions may be made on pragmatic grounds.... The distance measure does not correspond to the criteria of a topological distances."

- 20 Although the specification does not expressly address the use of an inverse relationship for this distance, such a function ( $1/x$ ) is implicitly considered as this

- 4 - REQUEST FOR CONTINUED EXAMINATION  
AND  
PRELIMINARY AMENDMENT B

function is well known in the art. Furthermore, the first carryover paragraph on page 6 alludes to an inverse relationship being considered where it states, "the distance from one document to itself gives a maximum value instead of zero" In other words, since the document distance is giving a measure to the degree of similarity between 5 documents, this sentence suggests alternative approaches that could be used for measurement of a document comparison that is compared to an identical document, i.e., that such a comparison could produce a result of zero, or the inverse of zero (infinity, or, in a practical application, some maximum value).

Thus, although the specification does not expressly describe this inverse 10 relationship, an inverse relationship is known to one of ordinary skill in the art, and such a relationship is further inferentially described.

For these reasons, the Applicants respectfully suggest that this claim language is enabled and ask that the 35 U.S.C. §112 rejection be withdrawn from the application.

15       2. *Applicant has added claims 18 and 19 that do not contain language pertaining to an inverse relationship.*

Applicants have added claims 18 and 19 indicating that the relationship between the documents is a known mathematical relationship. Such a limitation is supported in the Specification in the first carryover paragraph of p. 6.

20       **35 U.S.C. §102(e), Claims 1-17 Anticipation by Pirolli, et al.**

3. *Applicant has amended independent claims 1 and 10 to include features that are neither taught nor suggested by Pirolli.*

Applicant has amended independent claims 1 and 10 to require the presence of link symbols that represent the link relationship of the documents as well as

- 5 -       REQUEST FOR CONTINUED EXAMINATION  
AND  
PRELIMINARY AMENDMENT B

document symbols that are augmented by a marking dependent on the calculated measure of similarity. This combination of elements is neither taught nor suggested by Pirolli.

Based on these amendments, the Applicant asserts that the present invention is clearly distinguished over the Pirolli reference, and respectfully requests that the Examiner withdraw the §102 rejection from the present application.

### CONCLUSION

Inasmuch as each of the objections have been overcome by the arguments and discussion presented above, and all of the Examiner's suggestions and requirements have been satisfied, it is respectfully requested that the present application be reconsidered, the rejections be withdrawn and that this application be passed to issue.

Respectfully submitted,

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### CERTIFICATE OF MAILING

I hereby certify that this correspondence is being deposited with the United States Postal Service as First Class Mail in an envelope addressed to: Assistant Commissioner for Patents, Washington, D.C. 20231 on September 30, 2002.

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- 6 - REQUEST FOR CONTINUED EXAMINATION  
AND  
PRELIMINARY AMENDMENT B

**APPENDIX  
CLAIM MARK-UPS**

1. (Amended) A device for navigating documents connected by links,  
comprising:

5 a computer which comprises a graphical display~~], an input device, and a  
processor,~~

~~said computer operating according to a graphical display program which  
generates images on said graphical display; and~~

~~said computer operating according to a navigation program which identifies a  
10 measure of similarity of a starting document to a plurality of other documents and  
that utilizes said graphical display program to produce and display respective  
symbols of said other documents related to said starting document, said graphical  
display program also producing respective characteristics given to said respective  
symbols indicating a degree of similarity of said other documents to said starting  
15 document according to said measure of similarity.], the computer being configured to  
operate according to a program that displays document symbols representing the  
documents and link symbols representing the link relationship of the documents;  
wherein a similarity measure between a starting document and each other  
document is calculated, and wherein the document symbols are augmented by a  
20 marking dependent on the calculated measure of similarity.~~

10. (Amended) A method of displaying documents connected by links on a  
computer device, comprising:

~~[a graphical display, an input device, and a processor, wherein said  
25 documents are represented on said graphical display by respective symbols and~~

symbol characteristics, comprising the steps of:

~~choosing one document from a universe of documents as a starting document;~~

~~determining an operative group of said documents based on said starting~~  
5 ~~document;~~

~~calculating a measure of similarity between said starting document and each remaining document from said operative group; and~~

~~displaying respective symbols and symbol characteristics of each remaining document from said operative group, said symbol characteristics indicating a degree~~  
10 ~~of similarity based on said measure of similarity.]~~

providing a graphical display of the computer device;

displaying document symbols, using a computer program, that represent the documents and link symbols representing the a link relationship of the documents;

calculating a similarity measure between a starting document and each other  
15 document; and

augmenting the document symbols by a marking dependent on the calculated similarity measure.